

October 28, 2003

The Honorable Michael K. Powell  
Chairman, Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room 8-B201  
Washington, DC 20554

Re: Amendment of Sections 90.20 and 90.175 of the Commission's Rules for  
Frequency Coordination of Public Safety Frequencies in the Private Land  
Mobile Radio Below-470 MHz Band; WT Docket No. 02-285

Dear Mr. Chairman:

On February 21, 2001, the Association of Public-Safety Communications Officials-International, Inc. (APCO) filed a Petition for Rulemaking seeking to introduce competition in public safety frequency coordination services below 512 MHz. The Commission now seeks comment on APCO's Petition, while also inviting comments on other proposals that could improve frequency coordination procedures in the P/S pool through the above-referenced *Notice of Proposed Rule Making*.

The comments to follow are based on my 27 years experience as a private land mobile radio dealer in Dayton, Ohio. At P&R we pride ourselves on doing things right and we have many public safety customers from the county Sheriff to the City of Dayton. We also service many commercial accounts from GM Truck and Bus Group to Korrekt Plumbing. We have first hand experience with Licensing coordination in both Business Industrial and Public Safety.

Public safety coordination can become a very involved process. If channels are not available in the pool my client is eligible in (which happens quite often), the coordinator will then send the application to another public safety coordinator for a channel within an alternative public safety pool. If things go well, the process may end at this point, but with additional time and money incurred by my client since two public safety frequency coordinators had to "touch" the application. In some cases, however, additional public safety coordinators come into play due to the scarcity of frequencies, adding more time and money spent seeking much-needed channels for public safety licensees to perform life-safety services in the State of Ohio. Many results and options depend on who you talk to which is inconsistent and hard to deal with.

This process is not only out-dated, but also inefficient, costly and sometimes disruptive to the existing level of public safety services traditionally experienced in our community. If all public safety pools of channels were open to frequency coordination by any public safety or industrial/business coordinator, my staff could go to one coordinator to provide our clients with public safety channels in a timely manner, at a lower cost. The same should be true for our industrial/business clients. They, too, should be able to go to one frequency coordinator, whether public safety or industrial/business, to seek channels for the services they wish to provide.

Competition in the industrial/business pool, alone, has decreased the application processing time for our coordinator of choice, ITA, to less than a week in most cases; compared to the 6 week (or greater) periods typically spent waiting for public safety coordination. Ironically, public safety services need this type of speed just as much (if not more in certain instances) as industrial/business applicants. Competition in the industrial/business pool has also reduced costs, and lead to the creation of on-line frequency coordination software and other more efficient coordination tools.

The time is ripe for the Commission to do away with the archaic model of frequency coordination in the private land mobile services and allow for expanded competition (1) to hold coordinators accountable for reliable services; (2) to reduce prices; (3) increase speed-of-service; and (4) to spark innovative new means of customer service. Our government has sung the praises of a competitive marketplace for many years now; please allow the licensing process to catch up with the rest of the economy through expanded competition in frequency coordination services.

Sincerely,

David Reeves, Vice President  
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